

# BARKET EPSTEIN

BARKET EPSTEIN KEARON ALDEA & LOTURCO, LLP

666 OLD COUNTRY ROAD, SUITE 700  
GARDEN CITY, NEW YORK 11530  
516.745.1500 • [F] 516.745.1245  
WWW.BARKETEPSTEIN.COM

ADDITIONAL OFFICES:  
EMPIRE STATE BUILDING, NY, NEW YORK  
HUNTINGTON, NEW YORK  
ALL MAIL TO GARDEN CITY ADDRESS

June 20, 2023

## MEMO ENDORSED

**via ELECTRONIC FILING**

Hon. Edgardo Ramos  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Conflict International, Inc. et al. v. Stephen Komorek et al.*  
Docket No.: 23-CV-2165 (ER)


Dear Judge Ramos:

This office represents Mr. Komorek and API International Consulting Group, Inc. We are writing on consent of defense counsel to request a two-week extension of time to file our motion to dismiss in this matter. If acceptable, the deadline would move from June 27, 2023 to July 11, 2023. Opposition papers would then be due on August 10, 2023, and our reply would be filed on or before August 24, 2023.

The reason for this request is that I have been navigating some family health issues over the last several weeks, and I have a trial that is continuing in the Court of Claims on June 27, 2023. We trust that the requested extension of time will be sufficient in order to brief the Court on the issues contemplated by our motion.

This is the first request to extend this deadline. Thank you for your consideration.

The request is granted. The motion shall be filed by July 11, 2023. The opposition shall be filed by August 10, 2023. The reply shall be filed by August 24, 2023. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: June 22, 2023  
New York, New York

Respectfully submitted,

/s/ Alexander Klein  
Alexander R. Klein, Esq.

cc: All parties *via ECF*